

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION - CINCINNATI

TEDDY NICHOLS,

Plaintiff,

-vs-

Case No: C-1-02-0045

INDIANA MICHIGAN POWER COMPANY
RIVER TRANSPORTATION DIVISION and/or
AMERICAN ELECTRIC POWER FUEL SUPPLY,
RIVER TRANSPORTATION DIVISION
Jointly and severally,

Defendants.

PLAINTIFF'S SUPPLEMENTAL IDENTIFICATION OF WITNESS

NOW COMES Plaintiff, TEDDY NICHOLS, by and through counsel undersigned, O'BRYAN BAUN COHEN KUEBLER, and hereby provides the following Supplemental Identification of Witness:

1. Howard Neil
1351 Arnold Road
Rock Spring, GA 30739
706/375-5269

Mr. Neil is a cook/deckhand who worked for AEP River Transportation Division for many years. Mr. Neil has worked aboard vessels similar to the M/V Lakin Terminal and various AEP power plants, and loading and unloading facilities performing the operation Mr. Nichols was involved in at the time of the subject injury. Mr. Neil will testify that the training, procedures, manpower and equipment used for shifting barges at loading/unloading facilities are unsafe and that he is aware of the potential for injury in the manner in which Mr. Nichols alleges. Mr. Neil will testify that he has performed these duties on many occasions and has been jerked severely on many occasions in placing the pull-out cable as alleged by Mr. Nichols.

s/ Gary Wm. Baun
Gary Wm. Baun (P28758)
Kirk E. Karamanian (#0063787) TA
O'BRYAN BAUN COHEN KUEBLER
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Dated: May 14, 2004

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of May, 2004, a copy of **Plaintiff'S Supplemental Identification of Witness** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Gary Wm. Baun
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